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*Attorneys for Defendants*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

<p>GREYSTONE CDE, LLC,</p> <p style="text-align: center;"><i>Plaintiff,</i></p> <p style="text-align: center;">- against -</p> <p>SANTE FE POINTE, L.P., et al.,</p> <p style="text-align: center;"><i>Defendants.</i></p>	<p style="text-align: center;"><u>Civil Case No:</u> 07-CV.8377 (RPP)</p> <p style="text-align: center;"><b>DECLARATION OF BRIAN A. BLOOM IN SUPPORT OF DEFENDANTS' MOTION FOR A STAY</b></p>
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I, Brian A. Bloom, hereby declares the following under the penalty of perjury:

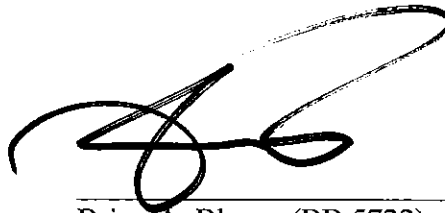
1. I am an associate of Akerman Senterfitt LLP, counsel for Defendants Sante Fe Pointe, L.P., Sante Fe Pointe Management, LLC, Rant LLC, and Theotis F. Oliphant (collectively, "Defendants") in the above captioned action.

2. I am familiar with the proceedings in this case. I make this declaration based on my personal knowledge of the facts and documents set forth herein and in support of Defendants' motion to stay the instant proceeding pending resolution of a venue transfer motion presently pending in the United States District Court, Northern District of California on a case ("the California Action") whose issues include those to be litigated here or, alternatively, to stay all such proceedings indefinitely, until final resolution of the California Action.

3. Attached as Exhibits hereto are true and accurate copies of the following:

- Exhibit A: Notice of Removal of Action Under 28 U.S.C. § 1441(A), dated October 25, 2007 (including exhibits thereto);
- Exhibit B: Declaration of Ann McFarland Draper in Opposition to Defendants' Motion to Transfer Case to Southern District of New York, dated November 30, 2007 (w/out exhibits);
- Exhibit C: Notice of Motion and Motion to Transfer Venue, including memorandum of law and all exhibits thereto, which includes the Declaration of Matthew James, filed in the United States District Court, Northern District of California (San Francisco Division) dated November 7, 2007;
- Exhibit D: *Greystone CDE, LLC v. Sante Fe Pointe L.P. et al*, Opinion and Order, 07 CV 8377 (RPP), dated November 29, 2007;
- Exhibit E: Declaration of Theotis F. Oliphant in Opposition to Defendants' Motion to Transfer Case to Southern District of New York, dated November 30, 2007; and
- Exhibit F: Engagement letter, dated August 29, 2006, between Greystone Servicing Corporation, Inc. and Theo Oliphant.
- Exhibit G: Declaration of Donald N. David in Opposition to Defendants' Motion to Transfer Case to Southern District of New York, dated November 30, 2007

I declare under penalty of perjury that the foregoing is true and correct. Executed in New York, New York on January 7, 2008.



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